

REMARKS

As to the drawings, the edge line between flats 82 and 84 will be brought in from the present location in line with the edge of the tool, as requested by the Examiner. This change is in the left side of Figure 1a. The vertical line through dogs 56 in Figure 1a will be eliminated. The vertical line through dogs 140 in Figure 3d will be eliminated. Item 128 in Figure 2a will be eliminated. Alignment flat 82 is on housing 72 as shown in Figures 1a and 1b. Alignment flat 84 is on crossover 86, which has an irregular lower end only a part of which is shown in section on the right side of Figure 1a. This feature allows the projection 90 to come into alignment with the receptacle 78 when the flats are aligned. This is clear from the specification and the drawing and this rejection is traversed. Adding more detail to this Figure will further unduly complicate it and provide less clarity rather than more clarity to one skilled in the art. Proposed corrected sheets are attached.

Page 22 in the specification is corrected as requested by the Examiner. The rejection of claim 3 for enablement is traversed. The plugging during run in is done with the running tool as shown in Figure 1a. The specification describes that the running tool is released when the downhole assembly is in position and this is the unplugging before the tubular with the auxiliary connection is tagged in below after the running tool is removed. These steps are discussed at length in the specification and the last steps of claim 3 are fully enabled.

The Examiner rejects claim 1 as anticipated by Meynier USP 5,355,952. The Examiner refers to the connecting part 9 as the tubular in claim 1 that is tagged in and had the auxiliary cable or conduit running along its length from the surface. In the reference item 9 is not a tubular that runs to the surface from the tag in location. Rather it is a short sonde that is dangled on wireline. The claim provides a tagged in tubular for surface access and a tagged in cable or conduit connection to the downhole assembly from the surface. In the reference, item 9 is a short sealed vessel that does not go to the surface. The tubular in claim 1 supports the auxiliary cable or conduit. In the reference the wireline runs in a closed vessel and provides the support for it to be located in the well. Any surface communication in the reference has to go through the sealed vessel whereas in the claim the surface communication set forth is through the auxiliary conduit or cable to the surface and from the downhole assembly.

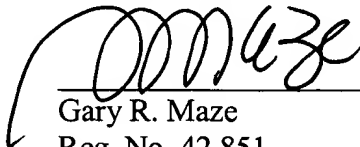
The Examiner has located another reference to cite against claim 1, Kobylinski, USP 6,298,921. The Examiner's anticipation rejection using this reference is also traversed. This reference allows taking sections of coiled tubing and quickly joining them together to make a desired length as opposed to relying on pre-measured lengths that in the past provided no easy way to join them together if additional length was required for the application. This reference teaches the use of a modular system that can allow sections of coiled tubing to be assembled to length with cable inside so that the cable becomes electrically connected when the sections of coiled tubing are joined together. There is simply nothing in this reference about connecting a module to another downhole. The entire assembly is done at the surface and then run in after being connected at the surface. Claim 1 requires downhole tagging into the downhole assembly with a tubular and an auxiliary cable or conduit. No such thing occurs in this reference. As to claim 3 there is no plugging during run in and subsequent unplugging as all assembly of the modules in the reference is done at the surface. The plugging in claim 3 is during run in of the downhole assembly. Before tagging in on a separate trip the plugged connection on the downhole assembly for the initial delivery downhole is no longer there to facilitate the tagging in. This technique keeps the debris from getting into the connection on the downhole assembly during delivery. It also makes it possible to test the integrity of the connection at the downhole assembly after it is delivered, as explained in the specification.

For the reasons given above with respect to claim 1 the other independent claims that carry the identical tagging in language done downhole are distinguishable from this reference that simply connects modules of coiled tubing with cable therein at the surface before running in.

All claims are submitted to be in allowable condition.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. Maze", is written over a horizontal line.

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Tracie Shippen

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